

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON, a
Washington Public Corporation; ELIZA
SAUNDERS, Director of the Office of
Public Records, in her personal and official
capacity; ALISON SWENSON, Compliance
Analyst, in her personal capacity; PERRY
TAPPER, Public Records Compliance
Officer, in his personal capacity; ANDREW
PALMER, Compliance Analyst, in his
personal capacity; JOHN or JAMES DOES
1-12, in his or her personal capacity,

Defendants.

No. 2:17-cv-00642-MJP

DECLARATION OF JAYNE L.
FREEMAN IN SUPPORT OF
DEFENDANTS' SECOND MOTION
FOR SUMMARY JUDGMENT

**NOTED FOR HEARING:
Friday, April 19, 2019**

I, Jayne L. Freeman, declare as follows:

1. I am one of the attorneys representing the Defendant in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants' Reply Brief in support of Defendants' Second Motion for Summary Judgment:

A. Attached as **Exhibit A** is a true and correct copy of excerpts from discovery responses from the University of Washington and Alison Swenson and transmittal letters confirming Alison Swenson and Andrew Palmer requested

1 employment records and not personal patient medical records in the course of
2 attempting to comply with the Public Records Act pursuant to their job duties at the
3 University of Washington.

4 I declare under penalty of perjury under the laws of the State of Washington that the
5 foregoing is true and correct to the best of my knowledge.

6
7 DATED this 19th day of April, 2019, at Seattle, Washington.

8
9 /s/ Jayne L. Freeman

Jayne L. Freeman, WSBA #24318

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorneys for Plaintiff

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DATED: April 19, 2019

/s/ Jayne L. Freeman

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